

Responses to Comments

commenter	code	Comment	Response
14	129	Mecklenburg County states that even though their permit is a one-page permit, they have prepared various regulatory documents and submitted them to the Department and have placed them in the operating record at the facility. They also state that because these documents exist, they believe it is unnecessary for them to undergo the administrative and regulatory requirements of the Department's permit amendment process.	The statute required the Department to review technical limitations, standards or regulations on which the original permit was based. The permit review checklist reflects information contained in the current permit. Facilities that lack current, facility-specific permit modules remain subject to their existing permits, any approved plans, and the standards in the applicable regulations. See the text of the Final Report for a further explanation.
29	116	Prince William states the permit review checklist states that the design report for permit 29 does not specify leachate recirculation is to be performed over composite liner areas. This only applies to the Phase I area and a permit amendment will be submitted at a later date addressing leachate recirculation.	The statute required the Department to review technical limitations, standards or regulations on which the original permit was based. The permit review checklist reflects information contained in the current permit. Facilities that lack current, facility-specific permit modules remain subject to their existing permits, any approved plans, and the standards in the applicable regulations. See the text of the Final Report for a further explanation.
29	117	Prince William states that the wetland delineation for Phase II and III as required in condition I.F.3 will be performed and submitted to the Department.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included into the permit is not reflected on the permit review checklist.
29	118	Prince William states that they are currently waiting for approval of a Part A expansion. Once approved it will become part of the permit.	The Department acknowledges that a permit amendment for a Part A expansion is currently under review. The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.
29	119	Prince William states that page 30 of the operations manual describes leachate disposal the facility.	The permit review checklist reflects leachate information is not in the Design section of the permit as reflected in the current regulations; however, the information is contained in the Operations Manual. No change is necessary to the permit review checklist.

29	120	Prince William states that leachate recirculation is not allowed in Phase I due to an alternate liner.	The checklist is correct. The permit does not restrict recirculation over an alternate liner, and the permit should restrict recirculation. No change is necessary to the permit review checklist.
29	121	Prince William states that a gravity sewer has been constructed at the facility. This information will be updated in the next permit amendment.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.
29	122	Prince William states that leachate treatment has not been discussed in the permit because leachate is being disposed of at a POTW through a gravity sewer line. A pretreatment system will be constructed if necessary and the permit will be amended to reflect the change.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.
72	128	Franklin County states that they have prepared numerous documents for the landfill and they provided DEQ with a list of those documents for review. These documents were not acknowledged in the permit review checklist.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist. See the text of the Final Report for a further explanation.
75	10	Rockbridge County agrees that their permit does not contain an Operations Plan, Site Plans, a GW Monitoring Plan, Gas Management System, Closure/Post/Closure Plan or Financial Assurance information but that these items exist and are located on site for review by DEQ staff. All of the items listed have been forwarded to DEQ for review in the past and have been approved with the exception of the closure plan, which has not been formally approved.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included into the permit is not reflected on the permit review checklist. See the text of the Final Report for a further explanation.
86	83	Appomattox County has addressed many of the deficiencies noted under the approved baler operations plan (1999). An emergency contingency plan has also been developed for the landfill.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included into the permit is not reflected on the permit review checklist.

86	84	Appomattox County has applied for and received approval for a Part A expansion at the current landfill location for a Subtitle D sanitary landfill. A Part B application has not been completed since the county has increased the current cell's life.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist. Since a Part B application has not been approved, no change is necessary to the permit review checklist.
86	85	Appomattox County has a VPDES permit for the landfill but is currently pumping and hauling leachate to a wastewater treatment plant.	The permit review checklist reflects information contained in the current permit. VPDES information is not included in the permit.
86	86	The Appomattox County landfill has a gas remediation plan for a portion of the landfill. This was approved in a permit amendment in 1999 that included an active and passive ventilation plan.	The Department has revised the checklist to state the Appomattox County Landfill has a gas remediation plan for a portion of the landfill.
86	87	Appomattox County has submitted groundwater protection standards in 2000 to the Department for review. The landfill is under a dual monitoring program with the closed area participating in the assessment monitoring program and the active area under detection monitoring.	The Department has revised the permit review checklist for the Appomattox County Landfill.
86	88	Appomattox County states that the amendment approved in 1999 addresses all concerns listed under section VII of the permit review checklist.	The Department has revised the permit review checklist for the Appomattox County Landfill.
86	89	Appomattox County states that it has submitted financial assurance to the Department and that it is currently under review.	The permit review checklist reflects information contained in the current permit. Financial Assurance information is not included in the permit.
86	90	Appomattox County has a post closure plan for permit 86. This plan is a stand-alone document and was not submitted with the original permit.	The permit review checklist reflects information contained in the current permit. The Post Closure plan is not included in the permit; therefore no change is necessary to the permit review checklist.
520	92	Rapahannock County states that a Part A was approved for permit 520 in 1993 for cell 3.	The Department has a record of this Part A approval in its files, but the approval is not included in the actual permit. The permit review checklist reflects information contained in the current permit.
520	93	Rapahannock County states that final grades for cells 1 and 2 for permit 520 were included in the certification report	The permit review checklist reflects information contained in the current permit. Information on final grades of the

		submitted to DEQ in July 1999 and can be found in the operating record of the facility.	facility is not included in the permit.
520	94	Rapahannock County states that the checklist for permit 520 incorrectly states that cells 1 and 2 were constructed prior to 1993.	The latest permit amendment does not include design information regarding Cells 1 & 2. The checklist has been revised to delete the comment regarding the date of construction for Cells 1 & 2.
520	95	Rapahannock County states that the checklist for permit 520 incorrectly states that there are no drawings showing the leachate collection system layout. The layout can be found in the facility operating record on drawings 5, 7, and 10 through 15. These drawings were submitted to DEQ in May 1994.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist. See the text of the Final Report for a further explanation.
520	96	Rapahannock County states that the checklist for permit 520 states the facility is in the assessment monitoring program. The facility is in the detection monitoring program.	The permit review checklist has been revised to state the facility is participating in the detection monitoring program.
103	72	The permit review checklist for permit 103 incorrectly states that the I-95 Landfill is subject to an Air Permit. The landfill is under the threshold value for criteria requiring a separate air permit.	The Waste Division believes the facility may be required to obtain an air permit. The Waste Division has referred this issue to the Air Division for them to determine if the facility is subject to an air permit. No changes will be made to the checklist at this time.
103	73	Fairfax County states that the notes section of the Permit Review Checklist for permit 103 contains a statement that is incorrect. The statement in question is "It appears the current designation of the unlined landfill is different from the permit." Fairfax County states that the designation of the unlined landfill is the same as the permit.	The review checklist correctly indicated that the unlined landfill did not contain design information for the unlined area.
103	74	Fairfax County states that design information on Phase IV of the unlined area was contained in the original information of the landfill, which has been filled and certified as closed. Phase IV of the ash lined landfill is current in the existing permit. Fairfax County is unclear what information DEQ is missing.	The liner design information for Phase IV is not included in the permit. The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.

103	75	Fairfax County states a closure plan was submitted in November 2000 to DEQ for review to correct the post closure care period to 30 years and to correct other issues associated with closure.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist. See the text of the Final Report for a further explanation.
103	76	Fairfax County states that design information on the unlined area is included in Section III-2, Facility Design of Permit 103. When the landfill recently completed the facility's permit amendment, DEQ staff and the county agreed that old information on previously landfilled areas was not to be repeated in the permit documents. Fairfax County is unsure why this information is desired.	The permit review checklist reflects information contained in the current permit. Design information on the previously landfilled area was not included in permit details since the area has already been designed and filled. The Department will update the permit review checklist to state that information on the unlined areas was removed from the permit during the last amendment.
103	77	Fairfax County states that on the permit review checklist for permit 103 comments are made under items B, D, E, and K concerning the unlined portion of the facility, which is closed. Information on the closed area was removed from the existing permit for clarity issues.	The Department is aware that the current permit does not contain information on the unlined areas. This is reflected on the permit review checklist. The Department will update the permit review checklist to state that information on the unlined areas was removed from the permit during the last amendment.
103	78	Fairfax County states that a Gas Monitoring Plan is included in permit 103. A Gas Collection System and Control System Design Plan and a Landfill Gas Collection System and Control System Design Plan have been submitted to DEQ.	Permit 103 does not contain a gas management plan; therefore no change is necessary to the permit review checklist. See the text of the Final Report for a further explanation.
194	60	Louisa County, even though they operate under a one page permit issued by the Virginia Department of Health, has developed many of the attachments that would be required for a permit currently issued by the Department, and maintains these attachments in their operating plan.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist. See the text of the Final Report for a further explanation.
194	61	Louisa County states that the report incorrectly states that the county maintains Phase II monitoring at the landfill. The County participates in the assessment monitoring program.	The permit review checklist has been modified to state the facility participates in the assessment monitoring program.

227	205	Lunenburg County states that a majority of the deficiencies noted on the permit review checklist for permit 227 are addressed in permit 544, approved by the Department in 1992.	The Department reviewed permit 227, not permit 544. No revision is necessary to the permit review checklist. Permit 544 is scheduled to be reviewed in the next scheduled permit review.
227	211	Lunenburg County states that the Part A for the expansion area covered by permit 544 was approved on July 23, 1990. The limits of the Part A approval are shown on Figure 2A in the Part A application.	The Department reviewed permit 227, not permit 544. No revision is necessary to the permit review checklist.
227	212	Lunenburg County states that the site conditions of permit 227 were described in a closure plan submitted to the Department in March 2001.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.
227	213	Lunenburg County states that base grades, modification plans, and cross sections for the Phase II are included in permit 544's drawings.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.
227	214	Lunenburg County states that the 100-year flood plain does not extend into the facility. This is noted in documentation related to permit 544.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.
227	215	Lunenburg County states that site access and utilities were addressed for the site under permit 544.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.
227	216	Lunenburg County states that the following issues were addressed in permit 544 and the approved closure plan: aesthetics, location of cells, and benchmarks.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.
227	217	Lunenburg County states that borrow and stockpile areas were identified on the Part B application drawings for Phase II.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.

227	218	Lunenburg County states that final topography of the disposal area is included in the approved closure plan.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist. The closure plan the commenter referenced is included in permit 544 and is not included in permit 227.
227	219	Lunenburg County also states that a site monitoring plan was included in the Part B application drawings. Landfill gas and groundwater wells have been installed at the site. A map noting the locations of these wells was attached to these comments.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist. See the text of the Final Report for a further explanation.
227	220	Lunenburg County states the regulatory requirement for liners was described in the design report submitted for the Phase II disposal area.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.
227	221	Lunenburg County states the active disposal area of the site is unlined but the expansion area will be designed with a composite liner in accordance with the regulations.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.
227	222	Lunenburg County states that piggy backing over the unlined sections of the landfill was not proposed or permitted. Piggy backing will not occur at this facility.	The permit review checklist reflects that piggybacking will not occur at this facility.
227	223	Lunenburg County states the existing disposal area does not have a leachate collection system but that a collection and control system has been designed for the Phase II area.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.
227	224	Lunenburg County states run-on and run-off controls are shown in the approved closure plan and in permit 544.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist. See the text of the Final Report for a further explanation.

227	225	Lunenburg County states a gas management plan was included in permit 544. Permit 227 does not contain a contingency plan in the event gas monitoring indicates concentrations of methane exceed compliance levels. A contingency plan is included in section B.5. of the closure plan included in the Part B application.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.
227	226	Lunenburg County states permit 544 includes a groundwater monitoring plan. The plan discusses detection and assessment monitoring. Groundwater Protection Standards have been submitted to the Department for review.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.
227	227	Lunenburg County states permit 544 includes an operations manual. Deficiencies noted in the review of permit 227 are generally included in the operations plan for permit 544. The only exception is an unauthorized waste acceptance plan. A control plan for unauthorized waste will be developed and placed in the facility's operating record prior to November 19, 2001.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.
227	228	Lunenburg County states the Department approved a closure plan for permit 227 on March 30, 2001. The deficiencies noted on the permit review checklist are addressed in the approved closure plan.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist. The permit review checklist reflects contents of the permit as of February 14, 2001.
227	229	Lunenburg County states they are in compliance with financial assurance for permit 227 and 544.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist. See the text of the Final Report for a further explanation.
228	186	The City of Petersburg states that they are in the process of updating the closure and post-closure costs estimates. Financial assurance documentation was submitted to the Department on August 17, 2001.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist. See the text of the Final Report for a

			further explanation.
228	187	The City of Petersburg states that they are in the process of revising the unauthorized waste inspection plan and that this will be accomplished by November 19, 2001.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.
228	188	The City of Petersburg states the Department has previously acknowledged closure of older cells in 1987.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.
228	189	The City of Petersburg states that there is a partial piggy back area over the HB 1205 area and the area has a 18 " clay liner.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.
235	139	Campbell County states that an Operations Plan, a Site Plan, a Groundwater Monitoring Plan, and a Closure/Post-Closure Plan for permit 235 has been submitted to the Department for review in response to comments received concerning a permit amendment. These documents are also available in the facility's operating records.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist. See the text of the Final Report for a further explanation.
235	140	Campbell County states that the Department has approved the financial assurance mechanism for permit 235.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist. See the text of the Final Report for a further explanation.
235	141	Groundwater Protection Standards for permit 235 were submitted to the Department in May 2001.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.
270	169	Permit 270 was recently amended and the facility assumed that any deficiencies in the permit would have been addressed in the amendment issued July 27, 2001.	During the processing of the last amendment, the Department only addressed items in the amendment request submitted by the permittee. The permit review checklist reflects information contained in the permit on the day the

			permit was reviewed. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.
285	65	Campbell County states that the permit review incorrectly states that the permit was only issued for Phase III and IV disposal areas.	The permit contains information on the Design section of Phase III and IV. Closure and groundwater for the old area are not in the permit.
285	66	Campbell County states that a Part A approval for the Phase III and IV disposal areas was approved on January 1, 1991.	This information is in the Department's files but is not included in the permit. The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.
285	67	Campbell County states that the report incorrectly states that the facility does not meet the liner requirements for a sanitary landfill. The currently active Phase III disposal area is lined in accordance with VSWMR and Phase IV will be constructed in accordance with VSWMR.	The review checklist correctly indicated that the unlined landfill did not contain design information for the unlined area.
285	68	Campbell County states that the report incorrectly states that the facility recirculates leachate with a recirculation tower. The facility does not recirculate leachate and does not have a recirculation tower. The county submitted a permit amendment in 1998 to update this information, but to date the amendment has not been approved.	The Department is currently reviewing this permit amendment. The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.
285	69	Campbell County states that the facility uses a 224,700-gallon leachate holding tank, not a 100,000 gallon tank. This information was included in the permit amendment submitted in 1998 that has not been approved.	The Department is currently reviewing this permit amendment. The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.
285	70	Campbell County states that groundwater protection standards were included into the permit in a permit amendment in August 2001.	The Permit Review Checklist for permit 285 was completed on March 21, 2001, prior to the approval of an amendment to the permit to include groundwater protection standards in the permit. No change is necessary to the permit review checklist.

285	71	Campbell County states that the report incorrectly states that groundwater monitoring is not being performed quarterly. The facility performs quarterly monitoring at the Phase III disposal area and semi-annual monitoring in the Phase II disposal area.	The permit review checklist has been revised to reflect the Phase II and Phase III monitoring frequencies.
307	110	U. S. Gypsum states that they do have a Groundwater Monitoring Plan, prepared in July 1996 and updated February 2000.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist. See the text of the Final Report for a further explanation.
307	111	U. S. Gypsum states that they began work on the Phase I monitoring network in October 1996 and are near the completion of Phase II monitoring work.	The permit contains no information on the groundwater monitoring status at the facility; therefore no change has been made to the permit review checklist.
307	112	U. S. Gypsum states that the production operation has been closed and dismantled but closure of the landfill has not begun. The landfill does receive some waste but closure procedures for the landfill are being prepared.	The permit review checklist has been revised to state the facility is in the process of preparing the facility for closure.
307	113	U. S. Gypsum currently provides financial assurance for the facility by using a letter of credit.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist. See the text of the Final Report for a further explanation.
314	5	Hanover County is prepared to answer each of the findings in the Permit Review Checklist if desired by DEQ.	The Department will contact facilities if additional information is needed from the facility.
314	6	Hanover County offered to forward a copy of the 1993 Part A to the Department.	The Department does not need a copy of this documentation to be submitted at this time.
314	7	Hanover County's operation's plan includes a "no unauthorized acceptance plan".	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist. See the text of the Final Report for a further explanation.

314	8	Hanover County's current permit amendment application includes a unit closure schedule.	The permit review checklist reflects information contained in the current permit. The Department is currently reviewing the facility's closure plan. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.
326	151	Hilltop Sand and Gravel states that their permit, when originally issued, incorporated reference plans and information submitted with the application. This information included engineering plans and an operations plan. Commenter states that they believe the technical review unfairly indicated that none of the information was included in the permit.	The original permit issued to this facility by the health Department stated the facility would be operated in accordance with plans and supportive data submitted and stipulations set forth in the letter of transmittal. Since the regulations have changed substantively since the permit was issued, the original submittals may not be entirely consistent with the criteria for permit issuance today. This is reflected in the permit review checklist. See the text of the final report for a further explanation.
326	152	Hilltop Sand and Gravel states that they have submitted a groundwater plan to the Department and it is misleading to state that the permit does not have a groundwater monitoring plan.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist. See the text of the Final Report for a further explanation.
326	153	Hilltop Sand and Gravel has a Operating Plan (with emergency and gas contingency plans) and Closure/Post-Closure plans in their operating record along with their current groundwater monitoring plan. This is consistent with the VSWMR.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist. See the text of the Final Report for a further explanation.
326	154	Hilltop Sand and Gravel 's permit review sheet states that closure information only exists for Phase I. Closure and Post Closure cost estimates have been prepared for the entire footprint. The permit review sheet indicated the cost estimate was for Phase I only. This should be clarified in the report.	A closure plan has been approved for Phase I of the facility. As part of this approval, a closure plan for the rest of the facility was to be submitted by the facility. The facility has submitted cost estimates that are currently being reviewed by the Department. The permit review checklist has been revised to clarify the status of the facility's financial assurance.

327	147	Rainwater Concrete Landfill operates in accordance with plans and supportive data submitted to obtain the permit.	The original permit issued to this facility by the Health Department stated the facility would be operated in accordance with plans and supportive data submitted and stipulations set forth in the letter of transmittal. Since the regulations have changed substantively since the permit was issued, the original submittals may not be entirely consistent with the criteria for permit issuance today. This is reflected in the permit review checklist. See the text of the final report for a further explanation.
327	148	Permit 327 does not contain a operations plan, site plan, GW monitoring plan, and closure/post-closure plan but that the facility has filed these plans with the Department.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist. See the text of the Final Report for a further explanation.
387	156	The title of the permit review checklist for permit 387 states that this is a review of a landfill, whereas the facility is a transfer station.	The title of the permit review checklist has been modified.
387	157	Two permit review checklists were completed for permit 387. One states the facility is named I-66 transfer station, the other states the facility is a miscellaneous unit, a landfill gas destruction system.	Permit 387 was issued for the operation of a transfer station. The permit was amended to include a gas system. Since these different activities are regulated under different sections of the VSWMR, the Department completed two checklists for the permit, one for the transfer station, and one for the gas system.
387	158	Fairfax County states that design plans, a design report, an operations manual, and a closure plan for permit 387 have been submitted to the Department previously.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist. See the text of the Final Report for a further explanation.
387	159	Fairfax County states that the permit review states an air permit is necessary for the gas extraction system at this site. Fairfax County disagrees. Additionally, the county states that they do not believe that a financial assurance test is necessary for this system.	The waste permit contains provisions requiring an air permit. Financial assurance is required for this facility, but is not provided for or mentioned in the waste permit. No change is required to the permit review checklist.

387	160	Fairfax County states that the I-66 transfer station operates under permit by rule status.	Permit 387 is a full permit, and the facility is not operating under a permit by rule.
394	196	Westvaco states that the permit review checklists did not recognize the Operations Manual included in the original permit application that has been revised and submitted to the Department numerous times since permit 394 was issued.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist. See the text of the Final Report for a further explanation.
394	197	Westvaco states that the permit review checklists did not recognize the closure plan and post-closure plan included in the original permit application that has been revised and submitted to the Department numerous times since permit 394 was issued.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist. See the text of the Final Report for a further explanation.
394	198	The review of permit 394 does not recognize financial assurance documentation submitted annually since in 1990.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist. See the text of the Final Report for a further explanation.
397	97	Commenter states that there were multiple specifications and drawings submitted to the Department of Health to obtain permit 397 that are not reflected on permit 397's checklist.	The original permit issued by the health Department included a site plan. Since the permit was issued, the permit has been amended several times and the permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.
397	98	Permit 397 has been amended more times than listed on the checklist. Permit 397 was amended September 13, 2000 to amend the Part A boundary. The permit was amended again on February 27, 2001.	The Permit Review Checklist has been revised to include this information.
397	99	The commenter states that permit 397's original permit documents address concerns noted in Section II B through O, Section III A, Section IV B and C, and Section VII A through K.	The original permit issued to this facility by the health Department referenced a plan on file with the health Department. Since the regulations have changed substantively since the permit was issued, the original submittals may not be entirely consistent with the criteria for permit

			issuance today. The permit review checklist reflects information contained in the current permit. See the text of the final report for a further explanation.
397	100	The commenter states that the leachate collection system for permit 397 was addressed in a permit amendment approved February 27, 2001. The facility also has a leachate management plan that was addressed in amendments on February 27, 2001 and October 10, 1997.	Permit 397 was reviewed February 15, 2001 and a permit review checklist was completed for the permit. Amendments approved after February 15, 2001 were not included in the review.
397	101	The commenter states that permit 397 has included a groundwater monitoring plan since it's initial issuance. The program has been amended and sent to DEQ for approval as the regulations changed. The facility currently is in detection monitoring.	The original permit issued to this facility by the Health Department contained permit conditions that included the monitoring of groundwater. Since the regulations have changed substantively since the permit was issued, the original submittals may not be entirely consistent with the criteria for permit issuance today. This is reflected in the permit review checklist. The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist. See the text of the final report for a further explanation.
397	102	The commenter states that permit 397 has had financial assurance in place since April 1997 and that current financial assurance documents are on file at DEQ's central office.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist. See the text of the Final Report for a further explanation.
413	190	Westvaco states that the permit review checklists did not recognize the Operations Manual included in the original permit application that has been revised and submitted to the Department numerous times since permit 413 was issued.	The original permit issued to this facility by the health Department references a plan on file with the Health Department. Since the regulations have changed substantively since the permit was issued, the original submittals may not be entirely consistent with the criteria for permit issuance today. This is reflected in the permit review checklist. The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that

			is not currently included in the permit is not reflected on the permit review checklist. See the text of the final report for a further explanation.
413	191	Westvaco states that the permit review checklists did not recognize the closure plan and post-closure plan included in the original permit application that has been revised and submitted to the Department numerous times since permit 413 was issued.	The original permit issued to this facility by the Health Department references a plan on file with the Health Department. Since the regulations have changed substantively since the permit was issued, the original submittals may not be entirely consistent with the criteria for permit issuance today. This is reflected in the permit review checklist. The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist. See the text of the final report for a further explanation.
413	192	Westvaco submitted a revised cost estimate for permit 413 in January 2001. An acknowledgement has not been received concerning costs estimates since March 1999.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.
414	193	Westvaco states that the permit review checklists did not recognize the Operations Manual included in the original permit application that has been revised and submitted to the Department numerous times since permit 414 was issued.	The original permit issued to this facility by the Health Department references a plan on file with the Health Department. Since the regulations have changed substantively since the permit was issued, the original submittals may not be entirely consistent with the criteria for permit issuance today. This is reflected in the permit review checklist. The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist. See the text of the final report for a further explanation.

414	194	Westvaco states that the permit review checklists did not recognize the closure plan and post-closure plan included in the original permit application that has been revised and submitted to the Department numerous times since permit 414 was issued.	The original permit issued to this facility by the Health Department references a plan on file with the Health Department. Since the regulations have changed substantively since the permit was issued, the original submittals may not be entirely consistent with the criteria for permit issuance today. This is reflected in the permit review checklist. The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist. See the text of the final report for a further explanation.
414	195	The review of permit 414 does not recognize financial assurance documentation submitted annually since in 1990.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist. See the text of the Final Report for a further explanation.
429	107	Commenter inquires who to contact about questions concerning the 10 Year Permit Review since the original reviewer is no longer with DEQ.	Commenters can contact Joe Levine with the Office of Waste Permitting.
429	108	Fluvanna County acknowledges that the current permit is two pages in length, and therefore does not contain components of a modern permit. The county has prepared a Part A amendment, Closure Plan, Gas Monitoring Plan and Operations manual that are not included in the current permit.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist. See the text of the Final Report for a further explanation.
429	109	Fluvanna submitted a revised permit review checklist for permit 429 that they believe more accurately reflects the conditions at the landfill. This data is in DEQ's files and/or the facility's operating record.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.
457	27	Dominion states that they are currently in the process of amending the permit for the Yorktown Power Station, and that as a result of the amendment, the permit will no longer be a one-page permit. The draft permit contains modules I, II, V, X, XII, XIII.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.

457	28	Dominion states that they are currently participating in the Phase II groundwater monitoring program, but that they submitted a request to the Department in July 2001 to return to Phase I monitoring.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.
457	29	Dominion states that the facility is lined with a 6 inch layer of clay soil, as stated in section 2.4.6 of the Operations manual.	The permit review checklist reflects information contained in the current permit and verifies that the information is in the location specified by the Regulations. At the time of the review, the Operations Manual was not included in the permit.
504	131	International Paper states that it received a Part A approval on March 11, 1991.	The permit review checklist has been revised to reflect March 11, 1991 as the date of the Part A approval.
504	132	International Paper states that they are not located in the boundary of the 100 year flood.	The permit does not specify if a flood plain is near the facility boundary. The review checklist reflects information contained in the current permit. No change is necessary to the permit review checklist.
504	133	International Paper pumps leachate to its VPDES permitted wastewater treatment facility as described in the operations manual.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.
504	134	International Paper will develop and submit a Gas Remediation Plan when required.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.
504	135	International Paper addresses an unauthorized waste acceptance plan in section F. 2 of permit 504. A Control Program for unauthorized waste will be developed and implemented by November 23, 2001.	The permit review checklist reflects information contained in the current permit. The Department appreciates the steps the facility is taking to ensure that a control program for unauthorized waste is implemented in accordance with the regulations.

504	136	International Paper has capped all of Phase I and a portion of Phase II but to date hasn't submitted a closure certification. A revised cost estimate has also been submitted but cannot be approved until closure certifications are submitted. Financial Assurance will be updated once the revised estimate is approved.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.
504	137	International Paper states they will comply with closure requirements of the leachate lagoon at the time of closure.	The statute required the Department to review permits, not all documentation related to a facility. The permit review checklist reflects information contained in the current permit. Facilities that lack current, facility-specific permit modules remain subject to their existing permits, any approved plans, and the standards in the applicable regulations.
504	138	International Paper states that they are complying with side slope and erosion control in the design plans submitted with the Part B application.	The Department has reviewed the permit and the erosion and sediment control plan needs to be modified to meet the standards of the current regulations. The permit review checklist reflects information contained in the current permit.
507	143	Northampton requests the Department to review plans (Landfill Gas Management Plan and Groundwater Protection Standards) prepared for the facility prior to indicating a deficiency on the permit review worksheet.	The statute required the Department to review permits, not all documentation related to a facility. The permit review checklist reflects information contained in the current permit. Facilities that lack current, facility-specific permit modules remain subject to their existing permits, any approved plans, and the standards in the applicable regulations. See the text of the Final Report for a further explanation.
520	91	Rapahannock County states that permit 520's cells 1 and 2 were officially closed in 1999. Cells 1 and 2 are lined with 60 mil HDPE liner with 2 feet of VDOT #57 stone as a leachate collection layer with perforated PVC piping. A leachate collection map is included in the operating record of the facility. Final grades were submitted to DEQ with the closure certification in 1999.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.
522	199	The permit review worksheet for permit 522 lists the date of 4/10/95 as the date of the Part A expansion. 4/10/95 is actually the date of the Part A approval for Landfill No. 5.	The approval date is the date of the Part A approval.

522	200	Commenter states permit 522 references site drawings submitted as part of the permit application.	Site drawings submitted with the permit application were incorporated into the permit. The permit review checklist has been updated to state 2 plan drawings were incorporated into the permit at time of permit issuance. The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.
522	201	Westvaco states that groundwater monitoring is not required for permit 522.	The permit does not reference a groundwater monitoring plan, however the unit is monitored under the same monitoring network of monitoring wells as Permit 394. This additional information has been added to the permit review checklist .
522	202	Westvaco states that the permit review checklists did not recognize the Operations Manual included in the original permit application that has been revised and submitted to the Department numerous times since permit 522 was issued.	The permit review checklist has been revised to state an operations plan for the facility was referenced in the original permit, however this permit has not been amended to include current plans in the permit.
522	203	Westvaco states that the permit review checklists did not recognize the closure plan and post-closure plan included in the original permit application that has been revised and submitted to the Department numerous times since permit 522 was issued.	When permit 522 was originally issued, the permit stated a closure plan was to be submitted to the Department for review. In essence permit 522 attempted to incorporate a document into the permit that had not been created at time of permit issuance. A copy of the closure plan was not included into the copy of the permit in the Department's files. Even though the facility may have submitted revised closure plans and post closure plans, the permit has not been amended to incorporate a closure plan or post closure plan meeting the current regulatory requirements. The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.

522	204	The review of permit 522 does not recognize financial assurance documentation submitted annually since in 1988.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist. See the text of the Final Report for a further explanation.
525	172	The summary page for permit 525 does not reflect the issuance of a major permit issuance on January 20, 2000.	The summary page has been expanded to include January 20, 2000 in the findings section.
525	173	Joyce Engineering states a site monitoring plan is included in Appendix I of the Groundwater Monitoring Plan for permit 525.	The permit review checklist has been revised to state a Groundwater Monitoring Plan is included in Permit 525.
525	174	Joyce Engineering states additional information on the information required to be submitted for permit 525 since the January 20, 2000 amendment contained drawings showing the proposed piggyback.	The permit review checklist has been amended to include the reference to the piggy back.
525	175	Joyce Engineering states that leachate from permit 525 is discharged directly to Henrico County's sanitary sewer.	The permit states that leachate is pumped and hauled to the Blackstone Sewage Treatment Plant. If this is incorrect, the facility should update their permit to reflect the current management of leachate at the facility.
525	176	Joyce Engineering states that the information requested in section V B. is currently not required for permit 525.	The permit review checklist reflects information contained in the current permit.
525	177	Joyce Engineering states that sections VII D.5. and VII H.1 are not applicable to permit 525.	We have revised checklist to reflect comment. Commenter is correct.
525	178	Joyce Engineering states that permit 525's closure plan (section I.A.1) includes information needed to address section VII A.1 of the technical review.	The permit review checklist reflects information contained in the current permit. See the text of the Final Report for a further explanation.
525	179	Joyce Engineering is unsure what information the Department is seeking on Section VIII A.2. of the permit review checklist.	The Department was reviewing the permit for references to disposal areas that have been capped.
525	180	Joyce Engineering states that the closure plan for permit 525 (section I.A.1.) lists the post-closure period as 10 years.	The permit review checklist has been updated to reflect information contained in the permit.
525	181	Joyce Engineering is unsure what information the Department is seeking on Section IX A.2. of the permit review checklist.	The permit review checklist has been updated to reflect information contained in the permit.

525	182	Joyce Engineering states that the closure/post-closure cost estimate was approved with issuance of permit 525.	The permit review checklist has been updated to reflect information contained in the permit. See the text of the Final Report for a further explanation.
525	183	Joyce Engineering states the Department deemed the cost estimate adequate for permit 525 on May 22, 2000.	The permit review checklist reflects information contained in the current permit. No change is necessary.
527	233	Federal Mogul states that they have received approval to use an alternate daily cover in October 9, 1992.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.
527	234	Federal Mogul states the closure plan references Table 3 of the permit that states the post closure care period is 10 years. No post closure use of the site is planned.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.
527	235	Federal Mogul states groundwater monitoring is performed semi-annually in accordance with permit 527, not on a quarterly basis.	The permit review checklist has been updated to reflect information contained in the permit.
529	48	Frederick County states that the facility does have a Title V permit that was issued September 30, 1999.	The permit checklist has been revised to state the facility has a Title V permit.
529	49	Frederick County states that their permit was amended in 1997 to include information on the onsite treatment and disposal under a VPDES permit. A copy of the letter acknowledging the amendment dated March 30, 1998 was submitted as an exhibit.	The modified portions of Permit 529 that were approved by amendment dated March 30, 1998, have been incorporated into the permit and the checklist has been revised.
529	50	Frederick County states that the facility groundwater monitoring plan was updated and was incorporated into the permit as module X on August 1, 2001.	Permit 529 was reviewed February 14, 2001 and a permit review checklist was completed for the permit. Amendments approved after February 14, 2001 were not included in the review.
529	51	Frederick County states that a description of closure of the surface impoundments was included in a permit amendment approved by the Department March 30, 1998.	The closure of the surface impoundment is addressed in the closure plan in the permit. The permit review checklist has been revised.

529	52	Frederick County states that under section II L., a "no" is recorded. This section addresses the use of benchmarks at the facility. Benchmarks and control points for the facility are maintained and in addition all groundwater monitoring wells have well casing elevations documented.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist. The permit contains no reference to the benchmarks as required. See the text of the Final Report for a further explanation.
529	53	Frederick County states that a "no" was recorded for section II M.; however, borrow and stockpile areas are noted on five of the facility permit drawings.	The permit review checklist has been updated to reflect information contained in the permit.
529	54	Frederick County states that Section IV A.1.c. is recorded as "no". The facility discharges directly into a receiving stream in accordance with 9 VAC 20-80-290 D.4. Changes to the facility permit were submitted to DEQ for approval September 2, 1997.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.
529	55	Frederick County states that a "no" is recorded for Section X.B. The facility currently has an approved financial assurance mechanism on file with the Department. The facility is currently in the process of modifying the facility closure plan to reflect closure cost estimates and this work will be submitted to the Department in the near future.	The permit review checklist reflects information contained in the current permit. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist. See the text of the Final Report for a further explanation.
871	62	American Waste Industries believes that it is un-true to state that the "permit does not contain any design or site plans, and very little in the way of the operation of the facility" since the original permit application in 1986 contained all information required for permit issuance at the time.	The information in American Waste's permit may have met the regulatory requirements for permit issuance in 1986 but the contents of the permit does not meet the criteria for permit issuance today. The permit review checklist compares the current permit with the current regulatory requirements for permit issuance. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on the permit review checklist.
871	63	American Waste Industries states that the Medical Waste Permit by Rule #114 includes a closure plan, closure cost estimate, and references to financial assurance.	PBR 114 was not subject to the 10 Year Permit Review; therefore, the contents of the PBR were not used in this review.

CUL	164	Permits issued prior to 1988 were required to submit a groundwater monitoring plan but that these submittals were not incorporated into the permits.	The permit review checklists reflect information contained in current permits. Information submitted to the Department for review or approval that is not currently included in the permit is not reflected on permit review checklists. See the text of the Final Report for a further explanation.
CUL	166	Permits issued by the Health Department referenced plans that were used to obtain the approval and many these documents were referenced in the one page permit.	The statute required the Department to review permits, not all documentation related to a facility. If a permit incorporated documents into permits, this information is evaluated on the permit review checklist. In most cases information submitted prior to 1988 to the Department for review does not meet current standards for a permit issued today. The permit review checklist reflects compares information contained in the current permit with information currently required by regulation for issuance of a permit. Facilities that lack current, facility-specific permit modules remain subject to their existing permits, any approved plans, and the standards in the applicable regulations.
CUL	168	The existence and use of the documents that make a pre-1988 permit "consistent with VSWMR" appear to satisfy the intent of the regulations and the commenter believes that these permits do not need to be amended.	The Department has addressed comments on the findings of the report and has corrected factual errors. The Department is not addressing permits that will be amended as a result of this review at this time. Facilities will be notified on an individual basis of the Director's intent to amend permits as a result of this review.
JOY	79	The 10 Year Permit Review did not consider any permit amendment applications submitted to DEQ but not processed. This gives an inaccurate picture of permit status of a facility.	The statute required the Department to review permits, not all documentation related to a facility. The permit review checklist reflects information contained in the current permit. Facilities that lack current, facility-specific permit modules remain subject to their existing permits, any approved plans, and the standards in the applicable regulations. See the text of the Final Report for a further explanation.

JOY	80	The 10 Year Permit Review did not include any reference to facility plans that owners and operators have developed, placed into operating records, or implemented regardless of whether DEQ has incorporated them into permits. Suggests that the 10 Year Permit Review should indicate that such documents, although in the operating record, were excluded from evaluation, to avoid any confusion.	The statute required the Department to review permits, not all documentation related to a facility. The permit review checklist reflects information contained in the current permit. Facilities that lack current, facility-specific permit modules remain subject to their existing permits, any approved plans, and the standards in the applicable regulations. See the text of the Final Report for a further explanation.
CUL	163	Commenter states that repeat violations involving the processing of submittals may be misleading since there may have been delays in processing the submittals or other extenuating circumstances.	The regulations contain requirements for submissions and include requirements for when submissions need to be sent to the Department. If a facility did not submit information or documentation in the timeframes allowed by regulation, the facility is in violation of the regulation. In the review of compliance histories, the number of violations was counted. The Department did not consider the severity of the violation or the circumstances surrounding the violation. If a facility disagreed with the inspector reporting an alleged violation on an inspection report, the facility should have notified the inspector immediately after receiving the inspection report. This review does not re-evaluate individual alleged violations noted on inspection reports.
62	230	Commenter questions if data was compiled in a similar manner for all regions throughout the state.	The Department formed a team to develop and review compliance histories of facilities. Data from all regions was compiled in a similar manner. See the text of the Final Report for a further explanation.
62	231	Commenter requests the Department to ensure that regionally collected data is properly adjusted to allow a statewide comparison.	Since all data was compiled in a similar manner, no adjustment is needed to compare compliance histories between facilities. See the text of the Final Report for a further explanation.

75	12	Rockbridge County states that they believe that the report is not the best way to determine the operational and environmental adequacy of an individual landfill due to the differences between landfills, inspectors, the regulations, and the subjective nature of inspections.	The Director is required by statute to examine the compliance history of each permittee and the technical limitations, standards, or regulations on which the original permit was based. In the report, the contents of the permit and the permittee's compliance with the permit are noted. The report states the contents of the permit and the number of alleged violations. For consistency, all permits were evaluated using the same criteria. By using a consistent process, all permits were evaluated equally.
75	13	Rockbridge County states that until there is a uniform, statewide training of inspectors, violations per inspection ratios are not a realistic way to judge a landfill's performance. The county suggests using a more scientific method based on measurements of environmental and/or health risk factors to judge a landfill's performance.	The report states the contents of the permit and the number of alleged violations. For consistency, all permits were evaluated using the same criteria. By using a consistent process, all permits were evaluated. The commenter did suggest using a more scientific method based on risk to judge a landfill's performance. If operation of a facility poses risk to human health and the environment, the Director may take immediate action.
91	41	Accomack County states that the report considers all violations the same, and does not note the severity of the violation.	The Department's current inspection forms contain severity levels. Previous inspection forms did not contain severity levels. In the past, the severity of a violation was assessed by the inspector and points were deducted on the inspection report. The Department has revised its inspection program to address this issue.
91	42	Accomack County states that the Department's visual presentation of information makes it appear to the uninformed that the facility is some how in violation of regulations because a component of the permit is missing.	The Department has added information to each individual permit review checklist stating the review did not include other documents the facility may have prepared, but that have not been included in the permit. See the text of the Final Report for a further explanation.
149	9	Fauquier County states they had reviewed the report and that it appears to be accurate and complete in it's content.	The Department agrees.

207	34	Celanese states they believe that a tabulation of "alleged" violations alone does not serve the purposes or needs of DEQ's legislative mandate. Celanese encourages DEQ to also consider the rating assigned to a facility during the relevant inspections, the points deducted from the facility and the facility's owner's response to any alleged violations.	Previously, the Department assigned grades to a facility after an inspection. The Department no longer assigns a grade of satisfactory or unsatisfactory to a facility; therefore, the Department was unable to use the rating assigned to the facility.
297	1	The facility is referred to by two different names in the report and cover letter, requests name to be Hampton/NASA Refuse-Fired Steam Generating Facility	The Department has corrected this and the report now lists the facility as Hampton/NASA Refuse-Fired Steam Generating Facility.
326	150	Commenter states that the term alleged violation was not in use until recently. The commenter questions how previous checklists and letters were converted to obtain alleged violations.	The Department currently uses the term alleged violation to describe possible deficiencies in compliance with the permit or regulations noted during an inspection. Violations noted on previous checklists were noted as alleged violations in the report.
326	155	Hilltop Sand and Gravel states that they believe that they are consistent with current VSWMR, have a good compliance history and they believe there is no need to amend their permit.	The governing statute sets out the basis for amending permits. Department will develop more specific criteria based on the statutory basis.
440	24	Dominion states that the comments on the Permit Review Checklist for the Chesapeake Energy Center should be adequately addressed in the next submittal to DEQ concerning the major amendment DEQ is processing for the facility.	The Department will continue to review the major amendment that is currently under review. The Department may request additional information to be included in the permit as a result of the 10 Year Permit Review.
440	25	Dominion alerts the Department to a discrepancy between the numbers listed on the compliance worksheet. The number of violations listed at the bottom of the page is 26, not 27. Assuming 26 violations, the facility has an average alleged number of violations per inspection as .74.	The Department previously corrected the calculation error on the compliance review worksheets, re-distributed the compliance review worksheets and requested comments to be submitted on the revised compliance review worksheets. The correct total number of violations for this facility for the ten years reviewed is 27.
451	146	Waste Management requests the opportunity to comment on any changes to be made to the current permit, permit 451.	The Department will follow the public participation guidelines for permit amendments.
461	47	Accomack County states that the Department's visual presentation of information makes it appear to the uninformed that the facility is some how in violation of regulations because a component of the permit is missing.	The Department has clarified in the report that the Ten Year Review did not include other documents the facility may have prepared, but that have not been included in the permit. See the text of the Final Report for a further explanation.

469	125	Shenandoah County states that they are concerned that inspection standards are not uniformly applied across all landfills in the Commonwealth. It appears that the number of alleged violations per inspection is significantly higher in the Valley Region when compared to other regions. This casts doubts as to whether this is an accurate gauge of the manner in which these landfills are operating or in compliance with the regulations.	The Department has reviewed the procedure for tallying violations with regional staff and all violations are calculated using the same criteria. The statute requires the Director to issue findings on the compliance history of the permittee and alleged violations are a means by which to examine an individual facility's compliance with the regulations. See the text of the Final Report for a further explanation.
529	57	Frederick County suggests using a weighted average. Previous inspection forms indicated the severity of a violation. There is a need for a variable scoring system to accommodate the severity of a violation regarding the potential to affect health and the environment.	The Department decided against using a weighted average in the Compliance History Worksheets, because of the difficulty in assigning relative weights, especially given the changes in the inspection forms over the years. Current inspection forms do contain severity levels for violations. If it is decided to amend or revoke permits based on the compliance history review, the severity level of recent violations will be considered.
529	58	Frederick County states that further separation of facilities is needed in order to compare facilities. CDD landfills and MSW landfill scores should not be compared due to the different regulatory requirements that must be met.	Due to the many similarities between landfills, the Department used the same checklists to evaluate the compliance histories of a facility. Due to the numerous types of inspection forms used during the past ten years, general categories of violations were developed to record violations. The checklist contains general areas that alleged violations occurred in. This allows comparisons to be made between the different types of landfill facilities included in the review.
529	59	Frederick County states that the facility's score is not reflective of the operations at the facility and the facility is concerned that the score will potentially impact the facility for years to come.	The Final Report reflects the information in the Department's records regarding the statutory review.
531	171	Waste Management requests the opportunity to comment on any changes to be made to the current permit, permit 531, and believes that the compliance history of the site warrants no changes to the permit.	The Department will follow the public participation guidelines for permit amendments.

CUL	161	Commenter states that the term alleged violation was not in use until recently. The commenter questions how previous checklists and letters were converted to obtain alleged violations.	All references to violations were converted to alleged violations on the compliance review checklists.
CUL	162	Commenter states they believe that the Department should weigh alleged violations against the actual environmental risk associated with a particular waste operation.	The Department decided against using a weighted average in the Compliance History Worksheets, because of the difficulty in assigning relative weights, especially given the changes in the inspection forms over the years. Current inspection forms do contain severity levels for violations. If it is decided to amend or revoke permits based on the compliance history review, the severity level of recent violations will be considered.
CUL	165	Many permit holders have developed plans required by the regulations but have not incorporated them into their permits.	The statute required the Department to review permits, not all documentation related to a facility. The permit review checklist reflects information contained in the current permit. Facilities that lack current, facility-specific permit modules remain subject to their existing permits, any approved plans, and the standards in the applicable regulations. See the text of the Final Report for a further explanation.
CUL	167	The technical review does not appear to include documents developed by facilities that have been placed in their operating record.	The statute required the Department to review permits, not all documentation related to a facility. The permit review checklist reflects information contained in the current permit. Facilities that lack current, facility-specific permit modules remain subject to their existing permits, any approved plans, and the standards in the applicable regulations. See the text of the Final Report for a further explanation.
JOY	81	Commenter states that there appears to be a significant inconsistency in inspection frequency and numbers of violations reported among the DEQ regions. They state that it appears that a facility in the Southwest Region is twice as likely to be inspected as a facility in the Valley Region and that a facility in the Valley Region was almost twice as likely to receive a violation than a facility in the Piedmont Region.	In the past, staffing levels were not adequate in every region to perform the same number of inspections at every facility. The General Assembly noted this and allocated additional money to address this problem. Regional staff is now available to inspect facilities on a more regular basis, and yearly inspection plans describe the minimum number of inspections for each facility type.

JOY	82	Commenter suggests that regional inconsistencies be taken into account as DEQ proceeds with the permit review process.	The Department has reviewed the procedure for tallying violations with regional staff, and all violations were tabulated using the same criteria.
29	114	Prince William county states that a majority of the alleged violations they received in 1999 and 2000 were due to exceedance of the methane concentrations along the "junkyard" property recently acquired by the county. The county signed a letter of agreement and a consent order with the Department and the issue of landfill gas migration has been resolved.	The Independent Hill Landfill did receive alleged violations for the migration of methane gas greater than the lower explosive limit beyond the facility's boundary. The landfill is currently complying with the consent order effective on June 14, 2001.
29	115	Prince William states that during inspections in 1995 and 1996, a minimum number of points were deducted during inspections and did not result in the facility receiving an unsatisfactory grade. These minimal deductions would most likely be considered areas of concern on the current inspection reports. The 15 alleged violations (due to minimal deductions of points) should not be counted toward the total number of alleged violations.	The number of points deducted indicates the severity of the violation. If the point deductions were lower, then the inspector marked the violations as less severe. However, every citation marked was counted as an alleged violation.
326	150	Commenter states that the term alleged violation was not in use until recently. The commenter questions how previous checklists and letters were converted to obtain alleged violations.	If the inspection reports contain alleged violations, then they were counted as such. Comments regarding these alleged violations or actions that the facility may have taken may also be included on the inspection report.
326	155	Hilltop Sand and Gravel states that they believe that they are consistent with current VSWMR, and have a good compliance history, and they believe there is no need to amend their permit.	The governing statute sets out the basis for amending permits. Department will develop more specific criteria based on the statutory basis.
228	184	Commenter states that a majority of the violations noted on the compliance review worksheet for permit 228 were for the closed older area of the landfill.	The Department agrees that the majority of the alleged violations documented during the period of time covered by the compliance history review were associated with the closed area of the landfill. The purpose of the Ten Year Permit Review was to report findings on the compliance of the facility; therefore, all alleged violations were listed on the compliance review worksheet.

228	185	Commenter brings to the Department's attention that during the past two years there were no violations.	The Department appreciates the efforts the facility has taken to comply with the solid waste regulations.
531	170	Waste Management states that the violations noted on permit 531's compliance review worksheet were either of a minor operational or administrative nature and that any alleged violations were corrected. No Notices of Violations were issued.	During the review of the facility's compliance history, all alleged violations were tallied. The severity of the alleged violation was not noted during the compliance review. Every citation marked was counted as an alleged violation.
91	38	Accomack County has reviewed the compliance review worksheet for permit 91 and states that there is a discrepancy between the county's findings and the Department's. The county states that there were 13 violations in 1994, 14 violations in 1995, 4 violations in 1996, and 27 violations in 2000.	On October 2, 2001 a representative of the Tidewater Regional Office met with Accomack County to review the County's compliance review worksheet. As a result of the meeting the compliance review worksheets for permits 91 and 461 have been revised.
91	39	Accomack County states that there were 42 inspections conducted at permit 91 during the ten-year period with 92 alleged violations. The average alleged violations per inspection is 2.19.	On October 2, 2001 a representative of the Tidewater Regional Office met with Accomack County to review the County's compliance review worksheet. As a result of the meeting the compliance review worksheets for permits 91 and 461 have been revised.
91	40	Accomack County states that the Department did not note how many alleged violations were challenged by the county in the Ten Year Permit Review and were dropped by the Department.	On October 2, 2001 a representative of the Tidewater Regional Office met with Accomack County to review the County's compliance review worksheet. As a result of the meeting the compliance review worksheets for permits 91 and 461 have been revised.
91	237	Accomack County disagrees with the Department including as alleged violations the comments made by inspectors but not annotated as alleged violations in the initial reports.	In some instances the inspector may have noted a violation at the facility that the facility was in the process of rectifying. In this instance, the inspector may not have deducted points for the violation, but the fact remains that a violation was present at the time of the inspection.
297	2	Facility states in 1998 they were inspected 3 times.	The Department has revised the compliance review worksheet to state the facility was inspected 3 times in 1998.
297	3	Facility states in 1999 they were inspected 4 times.	The Department has revised the compliance review worksheet to state the facility was inspected 4 times in 1999.

297	4	Facility states in 2000 they were inspected 3 times.	The Department has revised the compliance review worksheet to state the facility was inspected 3 times in 2000.
440	26	Dominion brings to the Department attention that the facility has not received any violations during the past three years.	The compliance review worksheet reflects that the facility has not received any alleged violations during 1998-2000 timeframe.
451	144	Waste Management states that they have been operators of the facility operating under permit 451 since September 1995. The incidence of violations has decreased since Waste Management began operating the facility. No violations occurred in the last 2 years of operation. This information is not reflected on the Compliance Review Worksheet.	During the review of the facility's compliance history, the compliance history for 1991 to 2000 was examined. Four alleged violations were noted during 1999. The Department appreciates the facility's commitment to maintaining compliance with the regulations.
451	145	Waste Management states that the alleged violations were minor and a Notice of Violation was not issued for any alleged violation. No harm was caused to the environment as a result of alleged violations.	During the review of the facility's compliance history, all alleged violations were tallied. The severity of the alleged violation was not noted during the compliance review. Every citation marked was counted as an alleged violation.
461	43	Accomack County has reviewed the compliance review worksheet for permit 461 and states that there is a discrepancy between the county's findings and the Department's. The county states that there were 15 violations in 1994, 4 inspections in 1995, 5 inspections in 1996 with a total of 6 violations in 1996, and 10 inspections in 2000 with a total of 7 violations in 2000.	On October 2, 2001 a representative of the Tidewater Regional Office met with Accomack County to review the County's compliance review worksheet. As a result of the meeting the compliance review worksheets for permits 91 and 461 have been revised.
461	44	Accomack County states that there were 42 inspections conducted for permit 461 during the ten year period with 48 inspections being conducted resulting in 80 alleged violations. The average alleged violations per inspection is 1.67.	On October 2, 2001 a representative of the Tidewater Regional Office met with Accomack County to review the County's compliance review worksheet. As a result of the meeting the compliance review worksheets for permits 91 and 461 have been revised.
461	45	Accomack County states that the Department did not note how many alleged violations were challenged by the county in the ten year permit review and were dropped by the Department.	On October 2, 2001 a representative of the Tidewater Regional Office met with Accomack County to review the County's compliance review worksheet. As a result of the meeting the compliance review worksheets for permits 91 and 461 have been revised.

461	46	Accomack County states that the report considers all violations the same, and does not note the severity of the violation.	During the review of the facility's compliance history, all alleged violations were tallied. The severity of the alleged violation was not noted during the compliance review. Every citation marked was counted as an alleged violation.
461	238	Accomack County disagrees with the Department including as violations the comments made by inspectors but not annotated as violations in the initial reports.	During the review of the facility's compliance history, all alleged violations were tallied. The severity of the alleged violation was not noted during the compliance review. Every citation marked was counted as an alleged violation.
504	130	International Paper states that 7 inspections were conducted in 2000, not the 6 indicated on the compliance review worksheet.	The compliance review checklist has been revised to reflect 7 inspections were conducted during 2000.
507	142	Northampton County states that a new administration team has been formed and the compliance review is not reflective of the current administration. The current administration is committed to maintaining compliance with the regulations.	The Department appreciates the new administration team's commitment to maintaining compliance with the regulations.
871	64	American Waste Industries states that the report states that 4 inspections were conducted in 1994 resulting in 12 alleged violations. Upon reviewing these inspection reports, AWI would like to draw the Department's attention to the following statement printed on the bottom of the inspection reports "A grade is not being assigned at this time due to implementation of new Regulated Waste Management Regulations and numerous variance petitions submitted by the operators." AWI does not have any further actions on these inspections.	Alleged violations were assessed during the inspections conducted in 1994. During this timeframe the facility submitted numerous variance requests, and since these requests were under review by the Department, points were not deducted on the inspection checklists even though the facility was not in compliance with the regulations. During the review of the facility's compliance history, all alleged violations were tallied. The severity of the alleged violation was not noted during the compliance review. Every citation marked was counted as an alleged violation.
227	206	Lunenburg County states the most common violation noted on the compliance review worksheet is for failure to have a certified operator. County employees have been unsuccessful in passing the certified operator test and the county is now contracting with a consulting firm to have a certified operator visit the site.	The Department appreciates the actions that the facility has taken to correct violations that have occurred at the facility.

227	207	Lunenburg County states that when you do not include violations received for not having a certified operator in the calculation to obtain alleged violations per inspection, the average is .87 violations per inspection.	Section 10.1-1408.2 of the Code of Virginia requires solid waste management facilities to operate under the supervision of a waste management facility operator. Since the facility did not operate under the supervision of a waste management facility operator, violations were noted during inspections of the facility. All violations of the regulations, statutes, and permits were reviewed during the compliance review of the facility.
227	208	Lunenburg County has corrected violations associated for not having an approved closure plan.	The Department appreciates the actions that the facility has taken to correct violations that have occurred at the facility.
227	209	Lunenburg County has also corrected violations received relating to a stormwater management plan.	The Department appreciates the actions that the facility has taken to correct violations that have occurred at the facility.
227	210	Lunenburg County included comments from inspection reports in 2000 stating the facility was in good condition and was well managed.	The Department appreciates the actions that the facility has taken to correct violations that have occurred at the facility.
223	236	American Electric Power states they believe they have only had 4 alleged violations in the past 10 years, not the 10 listed on the compliance review worksheet for permit 223. Commenter states the other 6 alleged violations were potential areas of concern.	The regional office staff have reviewed the inspection reports for this facility and have revised the facility's compliance review sheet to state 5 alleged violations occurred in the past 10 years.
72	126	Franklin County states that they have reviewed inspection reports in their files and have corrected violations noted on the reports.	The Department appreciates the actions that the facility has taken to correct violations that have occurred at the facility.
72	127	Franklin County states that since 1996, the number of violations has decreased, and that by 2000 the County was averaging less than one violation per inspection.	The Department appreciates the actions that the facility has taken to correct violations that have occurred at the facility.

207	30	Celanese states that the Celica Plant landfill had only 20 alleged violations, not the 24 indicated on the compliance review worksheet.	During inspections conducted on 6/17/96 and 7/28/99, four violations were cited for 5.3.C.1., 5.3.C.6, 10.1-1408.1, and 20-80-270C.12.; zero points were assessed for each violation. During the review of the facility's compliance history, all alleged violations were tallied, including violations noted where no points were deducted. The severity of the alleged violation was not noted during the compliance review. Every citation marked was counted as an alleged violation.
207	31	Of the 20 violations indicated, 2 are not relevant to DEQ's waste management program since they were addressed under DEQ's VPDES program.	Inspections on 7/14/00 and 8/31/00 cited violations for 20-80-270 C.19. (discharge of leachate to surface water). The facility states that the leachate discharged to the stormwater system and subsequently New River was a potential violation of a VPDES permit and should not be counted as a violation of the VSWMR. The Department disagrees. The VSWMR in 20-80-270 C.19 addresses discharge to state waters and since the facility allegedly violated this requirement the event is counted as a violation of the VSWMR.
207	32	Celanese states that in 2000 the facility had one violation, not two as listed on the compliance review worksheet. Celanese requests DEQ to revise the compliance worksheet.	Thirty-five points were assessed during the inspection on 7/14/00 for the leachate discharge. Zero points were assessed during the inspection on 8/31/00 because an action plan was submitted to the DEQ on 8/14/00 for approval. Regardless of whether zero points were assessed, the facility remained in violation, as leachate continued to be discharged to the stormwater outfall.
207	33	Celanese states that the 4 findings made by DEQ in 1996 and 1999 are more appropriately characterized as potential problems rather than alleged violation. Celanese requests DEQ to revise the compliance worksheet.	During the review of the facility's compliance history, all alleged violations were tallied, including violations noted where no points were deducted. The severity of the alleged violation was not noted during the compliance review. Every citation marked was counted as an alleged violation.

207	35	Celanese suggests that DEQ not consider situation where technical violations were noted but points not deducted, nor instances where facilities received ratings other than unacceptable in the results of the 10 year permit review.	During the review of the facility's compliance history, all alleged violations were tallied, including violations noted where no points were deducted. The severity of the alleged violation was not noted during the compliance review. Every citation marked was counted as an alleged violation.
207	36	Celanese also requests DEQ to report where owners responded to alleged violations in a manner designed to prevent their reoccurrence and explicitly report that the violations were not chronic nor likely to be repeated.	The purpose of this review is not to report the means by which a facility corrects a violation. Repeated violations or violations that are a threat to human health and the environment are addressed through the Department's enforcement program.
207	37	Celanese states that they have responded to all alleged violations in the past, that they have never experienced repeated alleged violations, and that they have never received an unacceptable rating.	The Department appreciates the efforts the facility has taken to comply with the solid waste regulations.
397	104	MRSWA also challenges the validity of violations for groundwater monitoring programs, monitoring requirements, and the permit reporting requirement. These violations were assigned while MRSWA was performing a hydrogeologic study on groundwater issues.	MRSWA apparently triggered assessment monitoring; however, declined to implement an assessment monitoring program. MRSWA contended that the constituents were originating from off-site (SWMF Permit 177). MRSWA did not submit an alternate source demonstration (ASD) and had not initiated an ASD when the violations were assessed. Only after these events did MRSWA pursue an ASD and discussions with the DEQ on a waiver from the assessment monitoring program, which was eventually granted. During the review of the facility's compliance history, all alleged violations were tallied, including violations noted where no points were deducted. The severity of the alleged violation was not noted during the compliance review. Every citation marked was counted as an alleged violation.
327	149	The commenter states that a majority of the alleged violations for permit 327 are merely comments, suggestions, or fail to take into account current negotiations with DEQ on certain issues.	The West Central Regional Office reviewed the Compliance Review Worksheet and recounted violations. The numbers that appear represent each instance when an inspector placed a mark in the Violation column on the checklist. In some cases zero points were assessed; however, a violation was indicated by a check in the appropriate column.

397	103	MRSWA challenged the violations received pertaining to decomposition of gas and for not having an approved gas monitoring plan received during 1997-1999. A gas monitoring plan was submitted to DEQ and was not formally approved until February 27, 2001. MRSWA believes that since they were not given a timely review, MRSWA should not be given violations for not having the documents.	The regulations require the facility to have a gas management plan in accordance with 9 VAC 20-80-280. Since the facility did not have an approved plan, violations were noted during inspections at the facility.
397	105	MRSWA also challenges violations for discharges to state waters between 1991 and 1999. These alleged violations concerned leachate seeps and none of the seeps produced enough volume of water to reach the perimeter ditches or state waters. Since the leachate did not reach state waters, these are not violations.	The VSWMR in 20-80-270 C.19 addresses discharge to state waters and since the facility allegedly violated this requirement the leachate seeps are counted as violations of the VSWMR.
75	11	Rockbridge county requests violations to be counted and tabulated uniformly, statewide and offers to meet with DEQ to review inspection reports for this facility to arrive at an agreed upon number of violations. Rockbridge County states that they believe they have had 71 violations during the report period with the average alleged violations per inspection equaling 2.37, not 3.87.	The Valley Regional Office has recounted and tabulated the violations using a process consistent with all the regions across the State. The Department has reviewed the compliance history of the facility and has revised the compliance review worksheet.
75	14	Rockbridge County states that in the past they have disputed violations and received documentation from DEQ stating that the violation was dropped, but these violations still appeared on the facility's compliance worksheet as alleged violations.	The Valley Regional Office has recounted and tabulated the violations using a process consistent with all the regions across the State. The Department has reviewed the compliance history of the facility and has revised the compliance review worksheet.
75	15	Rockbridge County states that the number of violations in 1991 should be 1, not 3	The Department has reviewed the compliance history of the facility and has revised the compliance review worksheet.
75	16	Rockbridge County states that the number of violations in 1992 should be 3, not 5.	The Department has reviewed the compliance history of the facility and has revised the compliance review worksheet.
75	17	Rockbridge County states that the number of violations in 1993 should be 6, not 8.	The Department has reviewed the compliance history of the facility and has revised the compliance review worksheet.
75	18	Rockbridge County states that the number of violations in 1994 should be 12, not 15.	The Department has reviewed the compliance history of the facility and has revised the compliance review worksheet.

75	19	Rockbridge County states that the number of violations in 1995 should be 4, not 7.	The Department has reviewed the compliance history of the facility and has revised the compliance review worksheet.
75	20	Rockbridge County states that the number of violations in 1997 should be 11, not 18.	The Department has reviewed the compliance history of the facility and has revised the compliance review worksheet.
75	21	Rockbridge County states that the number of violations in 1998 should be 5, not 8.	The Department has reviewed the compliance history of the facility and has revised the compliance review worksheet.
75	22	Rockbridge County states that the number of violations in 1999 should be 14, not 28	The Department has reviewed the compliance history of the facility and has revised the compliance review worksheet.
75	23	Rockbridge County states that the number of violations in 2000 should be 14, not 24.	The Department has reviewed the compliance history of the facility and has revised the compliance review worksheet.
429	106	Fluvanna County questions how multiple violations for a category exceed the number of inspections performed. Believes that the total number of alleged violations should be reviewed and reduced accordingly.	The Valley Regional Office has recounted and tabulated the violations in a manner consistent with the other regions in the State. There are no multiple violations for a single category per each inspection. The Department has reviewed the compliance history of the facility and has revised the compliance review worksheet.
469	123	Shenandoah County states that there are discrepancies between the figures listed in the report and their records. They believe the number of alleged violations is significantly lower.	The Valley Regional Office has recounted and tabulated the violations in a manner consistent with the other regions in the State. The Department has revised the compliance review worksheet.
469	124	Shenandoah County states that the report does not make any allowances for violations that have been disputed by the facility. The county has challenged alleged violations in the past and has not received responses from the regional office.	Alleged violations are discussed with the operator at the end of each inspection. Alleged violations noted in the written report are based upon the inspector's observations. The County should discuss disputed violations with the inspector and failing that, the inspector's supervisor.
527	232	Federal Mogul submitted a letter from the Department dated October 4, 1991 stating the facility had received a waiver regarding a disclosure statement. The facility's compliance worksheet lists a violation regarding a disclosure statement in 1999. Federal Mogul requests the Department to revise the compliance review sheet or advise them if a disclosure statement is required.	The Department has reviewed the compliance history of the facility and has revised the compliance review worksheet.

529	56	Frederick County is concerned about the inconsistencies between regions regarding the calculations concerning alleged violations found during onsite inspections. The county believes that the Valley Regional Office counted areas of concern when calculating the number of violations.	The Valley Regional Office has recounted and tabulated the alleged violations for Frederick County and the results are consistent with those of other regions in the State. Duplicate violations were not counted nor were areas of concern. Frederick County's total number of violations remained the same.
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Commenters

Commenter Code		Title	Representing	Address
297	Mr. Michael E. Croft	Operations Manager	Hampton/NASA Refuse-Fired Steam Generating Facility	50 Wythe Creek Rd. Hampton, VA 23666
314	Mr. Steve Chidsey	Solid Waste Manager	Hanover County	PO Box 470 Hanover, VA 23240
149	Mr. Ellis D. Bingham	Director	Fauquier County Department of Environmental Services	6438 College St. Warrenton, VA 20187
75	Mr. Thomas I. Higgins	County Engineer	Rockbridge County	150 S. Main ST. Lexington, VA 24450
440	Mr. Martin L. Bowling	Vice President Operations, Fossil and Hydro	Dominion Energy and Dominion Generation	5000 Dominion Boulevard Glen Allen, VA 23060
457	Mr. Martin L. Bowling	Vice President Operations, Fossil and Hydro	Dominion Energy and Dominion Generation	5000 Dominion Boulevard Glen Allen, VA 23060
207	Mr. Greg Twait	Staff Environmental Engineer	Cleanese Acetate Celco Plant	PO Box 1000 Narrows, VA 24124
91	Mr. Keith Bull	County Administrator	Accomack County	PO Box 388 Accomac, VA 23301
461	Mr. Keith Bull	County Administrator	Accomack County	PO Box 388 Accomac, VA 23301
529	Mr. Harvey E. Strawsnyder	Director of Public Works	County of Frederick	107 North Kent Street Winchester, VA 22601
194	Mr. Raymond E. Gay	Staff Environmental Scientist	Joyce Engineering	4808 Radford Avenue Richmond, VA 23230
871	Ms. Andrea Arredondo	Environmental Compliance Manager	American Waste Industries	508 E. Indian River Road Norfolk, VA 23523

285	Mr. Raymond E. Gay	Staff Environmental Scientist	Joyce Engineering	4808 Radford Avenue Richmond, VA 23230
103	Mr. Jeffrey M. Smithberger	Deputy Director, Division of Solid Waste Disposal and Resource Recovery	Fairfax County	12000 Government Center Parkway, Suite 463 Fairfax, VA 22035
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86	Mr. Andy Carroll	County Administrator	Appomattox County	PO Box 863 Appomattox, VA 24522
520	Mr. Jeffrey M. Fantell	Project Manager	Joyce Engineering	4808 Radford Avenue Richmond, VA 23230
397	Mr. Randall D. Bowling	Executive Director	MRSWA	PO Box 2130 Christiansburg, VA 24068
429	Mr. Edward J. Hollos	Project Manager	Draper Aden Associates	8090 Villa Park Drive Richmond, VA 23228
307	Mr. Wayne A. Smith	Associate Engineer	U. S. Gypsum	6072 S. Main Street Saltville, VA 24370
29	Mr. Thomas J. Smith	Solid Waste Division Chief	Prince William County	4379 Ridgewood Center Drive Prince William, VA 22192
469	Mr. Henry J. Mikus	Director	Shenandoah County Department of Solid Waste Management	349 Landfill Rd. Edinburg, VA 22824
72	Ms. Bonnie L. Johnson	Assistant County Administrator	Franklin County	40 East Court Street Rocky Mount, VA 24151
14	Mr. Samuel C. Nicolai	Project Engineer	Joyce Engineering	4808 Radford Avenue Richmond, VA 23230
504	Ms. Sheryl S. Raulston	Environmental Affairs Manager	International Paper	PO Box 178 Franklin, VA 23851
235	Mr. Larry Bertolet	Project Manager	Joyce Engineering	4808 Radford Avenue Richmond, VA 23230

507	Mr. William H. Sperry	Project Manager	Draper Aden Associates	8090 Villa Park Drive Richmond, VA 23228
451	Mr. Richard Guidry	Regional Compliance Manager	Waste Management	2061 Lake Cohoon Road Suffolk, VA 23434
327	Mr. John B. Connor	Attorney		1033 North Fairfax Street, Suite 310 Alexandria, VA 22314
326	Mr. Clemens S. Gailliot	President	Hilltop Sand and Gravel, Co.	PO Bo 10316 Alexandria, VA 22310
387	Mr. Jeffrey M. Smithberger	Deputy Director, Division of Solid Waste Disposal and Resource Recovery	Fairfax County	12000 Government Center Parkway, Suite 463 Fairfax, VA 22035
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525	Mr. Larry Bertolet	Project Manager	Joyce Engineering	4808 Radford Avenue Richmond, VA 23230
228	Mr. Mike Briddell	Acting Director of Public Works	City of Petersburg	800 Arlington Street Petersburg, VA 23803
413	Mr. Gregory W. Cox	Environmental Operations Supervisor	Westvaco	104 East Riverside Street Covington, VA 24426
414	Mr. Gregory W. Cox	Environmental Operations Supervisor	Westvaco	104 East Riverside Street Covington, VA 24426
394	Mr. Gregory W. Cox	Environmental Operations Supervisor	Westvaco	104 East Riverside Street Covington, VA 24426

522	Mr. Gregory W. Cox	Environmental Operations Supervisor	Westvaco	104 East Riverside Street Covington, VA 24426
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62	Mr. Stephen G. King	Director of Public Works	Rockingham County	PO Box 1252 Harrisonburg, VA 22803
527	Ms. Beth Morris	EHS Coordinator	Federal Mogul	PO Box 3250 Winchester, A 22604
223	Mr. Joel E. Harrison	Plant Manager, Clinch River Plant	American Electric Power	PO Box 370 Cleveland, VA 24225